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July 27, 1999
Peggy Arvanitas
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Clearwater, FL 33764

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
FCC Docket 99-122 / CC Docket No. 99-200

Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 Twelfth Street S.W. Room TWB204F
Washington DC 20554

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Dear Ms Salas,

Enclosed you will find the original and 4 copies of my
filing on this proposed docket. I will attempt to include a
diskette, however, if this does not prove fruitful, I hope
it will not invalidate my comments to you.

With Great Due Diligence,
Peggy Arvanitas
Peggy Arvanitas
Realtor

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(1)
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TNTRC

It meets with great urgency that we review and define measures to clarify and simplify our numbering problem. Also, how NANPA alias Martin Lockheed provides service on behalf of the FCC and every Public Service Commission in the US and all governed Islands.

Because of the 1996 Telecommunication's Act, we have experienced an accelerated issuance of numbers by NANPA on a first come-first serve basis. With a swipe of a pen, over 270 code holders ^{IN FLA} "project" or "forecast" a future need. By certifying not verifying need for 10,000 block numbers, we are dealing with tremendous problems undoing problems.

It's unfortunate that how NANPA functions is not being discussed here. Only how, ex post facto, they notify PSC in states when 80% of the numbers are allocated to NXX holders, and we are in jeopardy relief. Maybe the 80% figure should be lowered to 60%, with lottery provisions in place til and through jeopardy hearings are over. Because, the problems we are reviewing here will not be implemented in time to deal with NANP exhaust. And the State PSC cannot continue to react after the fact to an NPA exhaust. With

every man, woman, child, and unborn fetus having a cell phone, pager, and fax line, we still shouldn't be running out of numbers.

Peggy Lermanitas
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Arvanitas

BEFORE THE PUBLIC SERVICE COMMISSION CC Docket 99-200

#20-21

I am questioning that in the definition of a new entrant they are given one NXX per rate center. In fact, several of the major companies have cellular, paging, LEC's. The NANPA with the help of individual PSC's should review the ownership of subsidiaries. More than one company means multiple 10,000 number allocations from NANPA. If Fla PSC finds that say, GTE has 40% of the total NXX market in Fla, would we consider them a monopoly? If this has contributed to acceleration of jeopardy, then change NANPA's rules. This could be considered misallocation, and these are the public's numbers (NAN Code).

#23

According to Fla. docket 990373 the telephone Industry was adamant 30 year old PBX equipment commercial customers were incapable of consecutive numeration. The sheer justification that a business customer would have to buy new equipment was an immediate justification for closing the docket. The Industry has two different customers: business and residential. There was not this concern for 10-digit overlay and the residential customers buying new equipment. The Industry's concern is not with small business companies: realtors, mortgage lenders, insurance salesmen... We don't buy numbers in bulk.

#32-34 *cont. —*

Industry projections for NPA exhaust exclude a hard look at higher utilization of numbers for optimum conservation. Instead of a numbering problem, we have an equipment inefficiency. With money expended on Y2K upgrades, it is suspect that CMRS providers would be LNR and LNP capable in Nov. 2002 to pool. You cannot have 1/2 the "players" compliant, and the other 1/2 making excuses about having to purchase equipment.

#37-38

With great pain in Florida, we have experienced CMRS providers and their temper tantrums screaming they will not do mandatory utilization studies. NANPA cannot compile and expedite this data for the whole industry in 50 states plus islands and forward it to those prospective state PSC's. Public Service Commissions need to have jurisdiction to control and define the players, and to move quickly. This will extend the NANP.

#56 and #60

Growth codes or additional NXX allocations are according to certification. Once to exhaust worksheets are forecasting. The problem is they're sitting on too many numbers, so they don't have to be efficient. Have you ever tried to take back a bone from a hungry dog? What makes you think this voluntary number pooling is going to work? NANPA needs help in changing the rules for number allocation.

#59

Any NXX being allocated should have NANPA communicating

before the NXX is released to the PSC. If the PSC had an idea of the speed of the NXX releases, they might be able to brace themselves for NPA exhaust.

#62

Florida's docket 990373 (may/99) created a major argument with industry comments. It concerned utilization as a measurement. I actually support actual historical experience over forecasting.

#71-72

I believe COCUS is a waste of CONSUMER time and money. It's another NANPA padded expense. Industry gives partial figures to COCUS, and the COCUS has been slow with the figures and terribly inaccurate. Utilization studies are not mandatory as of yet. This function is better absorbed in the state Public Service Commissions.

#77

Of course, in the areas where FCC and NANPA have designated them to be the highest 100 MSA's reporting should be done quarterly. COCUS reporting is shameful. Florida has a lot of older retiree's. In Hillisborough/Pinellas county, vendors and big business customers were notified 6 months earlier of impending exhaust, and most likely get DID's, reserved numbers, .Residential customers ie the public were notified 3 1/2 months before a PSC hearing. COCUS's should have a primary function to notify more often. However, the are caught up, in a very bureaucratic Martin Lockheed, alias NANPA.

#78

The Industry wants utilization studies to be confidential. I disagree, although what they charge for business customer's phone numbers and their yield in areas is their proprietary information. The public deserves an accounting of their numbers and an explanation for their misuse.

#82

Utilization and forecasting needs to be done 2-3X's a year. To report at the NPA levels would not show the NXX code holder's inefficiency, so NXX level for reporting.

#92 and #100

NANPA is industry created, and I'm afraid, an industry bias. NANPA should have no enforcement functions, only allocation of numbers. We can't afford a budget for NANPA that's half of the FCC's. NANPA's withholding of NXX's should only come from the prospective PSC by order.

#105

Rate center consolidation should be done before 1000 block pooling. Some carriers have volunteered this proposal in our florida PSC docket 990373.

*#124-127

I fail to understand how 10-digit dialing would be less disruptive to customers. This is how most simple Floridians feel. I dial 7 digits, that's a local call. I dial 10 digit number, that's a 25 cent toll call. And, a 1 before a 10-digit number is a long distance call. Any change beyond that would be confusing. Florida utilization rates hover around

30%. Why do we need 10 digit overlay when we haven't used the other 70%? And to suggest spending over \$50 billion minimum for a 4-digit NPA? Why? So, we can increase numbers disbursed by 25%? Where's the logic?

* #145

There are two types of carriers, telephone and cable. About 5 years ago, these two types of carriers started buying each other. The cable industry had fiber optic and hybrid fiber coaxial wiring- the speed of light transmission. And most of the phone companies had the 30 yr old copper wiring with the old fixed Lucent AESS switches. Why should the public reimburse them for upgrading equipment? They are not monopolies anymore coming to PSC's for cost plus raises. With these 10-15% profit increases, they can start spending money on equipment.

#158

I do not know how the FCC thinks in 10-19 months from a regulatory order that pooling can begin. When the FCC gave 3 years for the CMRS providers to be compliant, how can you have less than 1/2 the Industry giving up a limited resource? The hungry dog will not give up the "number" bone.

#159-#160

The 1996 Telecommunications Act said, basically, "All carriers are created equal." NANPA releases numbers equally, on a first come first serve basis. Unfortunately, we are on the threshold of number pooling, and CMRS and paging companies want exclusions. Are we then to release less NXX

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numbers to them then LEC's? CMRS providers can't have it both ways.

#172

The 1996 Telecommunication's Act said, in essence, "All telecommunications companies are created equal." So, now, with paging companies expending 10% of the NXX usage, why are they being excluded from number pooling? What the public doesn't realize is some of these companies enjoying record profits have 15-20 yr old equipment. Paging companies, LEC's CMRS providers alike, why do they think they should be reimbursed for number pooling equipment upgrades? They need to get into the 21st century. How by the way, are paging companies going to participate in porting numbers?

* #182-#184

I am at a loss to understand the benefits of a pooling administrator. NANPA and the pooling administrator need to be different parties. Martin Lockheed can't ask for numbers from themselves. I have no idea how NANPA believes it should receive utilization studies from all 50 states and Islands and eventually share them with those prospective PSC's.

I feel, now that Martin Lockheed lost their F-22 contract from budget cutting that they would create a greater demand for themselves. They need the income, ie a loss of revenue. We can't have a budget for NANPA that's 1/2 of FCC's.

#188

I agree with Cox communications that the over 10%

contaminated 1000 blocks would exclude ILEC's from contributing numbers back to the pool. It will take the same energy and due diligence for software to LNR one ported number rather than 200 ported numbers, especially if they are non consecutive. Therefore, so all is fair, raising the contaminated level to 25% should open up more numbers to the pool. Also, the "9 month of inventory" clause would allow the Industry to pad themselves with numbers. We need a more concrete number, or we will be "forecasted" into the grave.

~~7~~#204

PSC has a problem with compliance with CMRS providers producing utilization studies. That the FCC thinks that the LEC's and CMRS providers will not create an "end user" cost is a joke. Calling card charges are an example. As a matter of fact, GTE of Florida is charging a number porting charge of 76 cents on local phone service bills. This is comical, in that #64 on your own docket says that it will be 4-6yrs to be able to port a number. How is it possible that you could charge now for what you MIGHT be able to do in 4-6 yrs?! Is FCC going to FINE GTE of Florida for this, or are you going to wait for a private citizen to sue them?

#227

Actually, the only measurement of compliance will occur when you allow the prospective state PSC's to monitor NXX issuances. And waiting to hear from NANPA to tell you they have given out 80% is unacceptable. You throw numbers out

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on a first come first serve basis, then spend the next four years figuring out a way to ~~make~~ the Industry SHARE the numbers. Lowering the jeopardy threshold to 60% before notification would be a smart idea. The NANPA and FCC are not hearing complaints first, PSC's are. So, punishing and fining and auditing should be released to the states, as well as the money that was being paid to NANPA. NANPA and COCUS are slow, have you gotten the forecasting figures from COCUS yet for this year's reports?

#214

It is not advisable to allow carriers the ability to do UNP without expressed jurisdiction and review from the PSC. First, you need a record of the NXX holders. Second, certain land based carriers have CMRS subsidiaries. And some more than one subsidiary, so these companies are healthy with numbers padded all around them. Of course, they would feed their subsidiaries first.

#216

"Carrier choice" for efficient number usage is a misnomer. The industry cannot police itself. What is the percentage of NXX requests that the NANPA denies? In less than 5 months, 727 area code had 50% ~~more~~ ^{of} NXX codes released, and we did an area code split in Feb/99! How many times a year is Pinellas county supposed to be in jeopardy relief! And we will NOT do 10-digit overlay, so tell big business to prepare for new area codes.

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#218

The Industry has said, they will not buy numbers. What they will do is buy up smaller companies that have numbering resources. Another reason to say no to UNP, unless it is through the PSC.

#222

Utilization rates should be higher in areas where there is a higher urban density. The burden and the cost to both business and residential customers is greater. The utilization reports are best controlled and reviewed by the state Public Service Commissions. NANPA lacks the jurisdiction and the prudence to fine improper "squirreling" of numbers. Therefore, the higher the density, the higher the utilization rate, reviewed not by the carrier but the PSC

#223

Once again, FCC or NANPA can review or audit incorrect forecasts for numbers. But are you going to take the numbers back? Refuse to give them more numbers? Imagine this scenario. Gte requests an NXX from NANPA. NANPA notifies the Fla PSC for verification of certification in that area. Also, if utilization studies are low with other NXX's, PSC could invalidate the release to NANPA. How long must we expect post facto run out of numbers? Auditing for false forecasting and fighting for fair number pooling? Why? Stop the insanity. Stop giving them out first come first serve as fast as some company can fill out a form.

#232

This is a falsehood, to assume that costs for upgrading

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numbering resource equipment should be borne by consumers. The reason we have a numbering crisis is because of equipment inefficiency. 30 yr old copper wiring, as GTE has in most it's rate centers is old and slow. Along with their fixed switches and DC 50 amp in the field. If 40% of the numbers call in through a 10,000 number switch, it might shut down. Times Warner has HFC wiring with variable switches. Any overflow flips to a node, no black-outs. Some companies enjoyed record profits while refusing upgrades. They are not monopolies coming before the PSC for a cost plus. They should absorb their own costs.

#233

Numbering exhaust because of improper utilization of numbers; can the PUBLIC sue? Because if these are the public's numbers (NAN code) and FCC has stated this, than as a small business consumer, I have been damaged.

10-digit overlay for instance, renders most 10-20 yr old phones, security systems, condo security phones useless because they lack 10 digit capability. This is beyond my stationary and business cards. Production is down a good 20% in our area with the new area code. Those that are getting out of state phone calls (second home , investment properties) are doing minimum 2000 piece mailings/ month. I will spend, as well as 10 other people in my office, \$6000 minimum a year extra for mailing, for a less than normal dollar yield.